

October 31, 2014

David Seltz
Executive Director
Health Policy Commission
Two Boylston Street
Boston, MA 02116

Dear Executive Director Seltz,

On behalf of Beth Israel Deaconess Care Organization (BIDCO), I am writing to offer support for the proposed regulations on Notices of Material Change and Cost and Market Impact Reviews (CMIR) (958 CMR 7.00).

Confidentiality

We strongly support the proposed change to Section 7.09 to keep confidential nonpublic documentation as part of the CMIR process.

Timeline

We also commend the Commission for the proposed change to Section 7.03(2) to allow providers to submit materials for review earlier than 60 days before the effective date. The process of providers joining our organization includes important onboarding activities that take place well in advance of 60 days before their effective date with us. The ability to go through the CMIR process before the onboarding begins is critical to our operational success with new groups.

Thank you for the opportunity to offer comments and for the strong proposed changes to this important regulation.

Sincerely,



Christina Severin
President and CEO